

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

JORGE ROJAS, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

TAX RELIEF HELPERS, INC.

Defendant.

Case No. 1:24-cv-05166

Hon. Elaine Bucklo

REVISED 26(F) REPORT

Pursuant to this Court's September 30, 2024 Order (ECF No. 7), the plaintiff Jorge Rojas and defendant Tax Relief Helpers, Inc. ("Tax Relief Helpers" or "Defendant") revised 26(f) report.

Status of Discovery: The Plaintiff has served discovery and the parties have began discussing depositions of the Defendant's representatives identified in discovery. However, as outlined in the Plaintiff's Motion to Compel (ECF No. 9), the Defendant has not made any document production, including with respect to documents it has agreed to produce, despite making prior representations that they would be provided. As such, the Plaintiff's Motion to Compel remains pending and has been noticed in front of Judge Laura K. McNally (ECF No. 13).

The parties propose the following schedule and information required by the Court's Order:

EVENT	DEADLINE/DATE
Initial Disclosures	October 10, 2024

Discovery	May 30, 2025
Plaintiff Expert Reports	May 19, 2025
Defendant's Expert Reports	June 20, 2025
All Expert Discovery Completed	August 1, 2025
Class Certification filing deadline	August 19, 2025
Status Conference post MSJ and Class Certification	TBD
Final Pre-Trial Order	TBD
Trial	TBD

1. Settlement

The parties are mediating this matter in front of Hon. David Jones (Ret) in April of 2025.

2. Consent.

The parties do not unanimously consent to proceed before a Magistrate Judge.

Dated: January 22, 2025

PLAINTIFF,
By his attorneys

/s/ Anthony I. Paronich
Anthony I. Paronich
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DATED: January 22, 2025

Respectfully submitted,

Defendant Tax Relief Helpers, Inc.

By: /s/ Kevin J. Cole
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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2025, I electronically filed the foregoing through the Court's CM/ECF System.

/s/ Anthony I. Paronich
Anthony I. Paronich, *Pro Hac Vice*